

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CONCETTA NYMAN, )  
Plaintiff, )  
v. )  
FEDERAL RESERVE BANK )  
OF BOSTON, )  
Defendant. )  
)

**JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1**

## I. Joint Discovery Plan

#### A. Time and Length of Discovery Events

Requests for documents served by November 30, 2005.

Interrogatories served by November 30, 2005.

Depositions completed by February 28, 2006.

Requests for admissions served by May 3, 2006.

## Phased Discovery

The parties agree that discovery may be phased to the extent that the first phase includes discovery related to Plaintiff's alleged damages, all of which are essential to the parties' ability to realistically assess the case. The parties agree that expert discovery can be reserved for a second phase of discovery.

**B. Proposed Schedule for Filing Motions**

Motions to amend pleadings served by December 7, 2005.

Motions for summary judgment served by June 28, 2006.

**C. Certifications**

Defendant will file its certifications under separate cover.

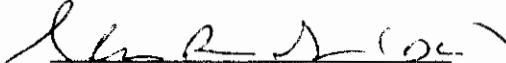
CONCETTA NYMAN

FEDERAL RESERVE BANK  
OF BOSTON

By her attorneys,

By its attorneys,

  
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Dated: July 22, 2005